## EXHIBIT C

From: Kirstin Stoll-DeBell

Sent: Monday, June 20, 2011 4:32 PM

To: Peter A. Gergely

Subject: FW: Claim 6 of the '683 Patent

From: Strapp, Michael [mailto:MStrapp@goodwinprocter.com]

**Sent:** Monday, September 20, 2010 2:35 PM **To:** Kirstin Stoll-DeBell; LawsonService

Cc: ML-ePlus Goodwin Service; cmerritt@cblaw.com; Henry Willett

Subject: Claim 6 of the '683 Patent

## Kirstin:

ePlus hereby notifies Lawson that it will not assert at trial that Lawson infringes claim 6 of the '683 patent. As you are aware, the only limited purpose for which the Court had permitted Lawson to introduce evidence concerning versions of Lawson software prior to the versions accused of infringement by ePlus was with respect to Lawson's allegation of invalidity concerning one claim element of claim 6 of the '683 patent. Accordingly, now that ePlus has withdrawn its assertion of infringement of claim 6 of the '683 patent, and, additionally, for all of the reasons previously articulated by ePlus and set forth in the Court's prior rulings, all evidence and exhibits concerning Lawson software prior to the versions accused of infringement by ePlus are irrelevant and inadmissible. As such, please confirm before our meet and confer tomorrow afternoon that Lawson will withdraw the following exhibits:

- 1. DX 31 Lawson Insight II for IBM AS/400 Auto Installation Guide for Version 7.2.2.2 (L0345798-0345979)
- 2. DX 32 Lawson Insight Inventory Control Release 7.0.7 Technical Text (L0359390-0359607)
- 3. DX 33 Lawson Insight Inventory Control Release 7.0.7 User Text (L0359608-0360482)
- 4. DX 34 Lawson Insight Inventory Control Release 7.0.7 Data File Text (L0358883-00359389)
- 5. DX 35 Lawson Software Release 6.0 (L0004381-00004386)
- 6. DX 41 Lawson Purchase Order Release 6.0 Enhancement Design (L0024261-0024357)
- 7. DX 43 Lawson Purchase Order Release 6.0 User Text (L0015615-0016422)
- 8. DX 44 05/23/93 Letter to Lawson from Maurice Blauch from Aircraft Service Int's (L0021190)
- 9. DX 64 UNIVERSE for UNIX Getting Started Release 2.1 dated February 1994 (L0013572-0013711)
- 10. DX 73 Lawson Software Purchase Order Procedures Manual Release 6.0 (L0013146-013295)
- 11. DX 74 Lawson Software Requisitions Procedures Manual Release 6.0 (L0009725-0009773)
- 12. DX 75 Lawson Software Inventory Control Procedures Manual Release 6.0 dated 01/01/94 (L0012837-0013145)
- 13. DX 175 UNIVERSE for UNIX Database administration Release 2.1 dated March 1994 (L0025716-0025938)
- 14. DX 181 Lesson Four Process Bids (LE02060596-02060609)
- 15. DX 186 Purchase Order Procedures Manual Version 7.2.0 dated February 1999 (LE01078665-01078888)
- 16. DX 190 Chapter 20 Application Changes from Release 6.0 (L0373955-0374057)
- 17. DX 191 Requisitions Procedures Manual Version 7.2.1 dated April 1999 (LE01101046-01101231)
- 18. DX 192 Purchase Order Procedures Manual Version 7.2.1 dated April 1999 (LE01100551-01100774)
- 19. DX 193 Procurement Management Technical Guide Version 7.2.1 dated April 1999 (LE00354500-00354727)
- 20. DX 195 Requisitions Procedures Manual Version 7.2.0 dated February 1999 (LE01078889-01079072)
- 21. DX 247 5.0 Source Code (L0172985)
- 22. DX 250 7.2.4 Source Code (L0135743)
- 23. DX 327 6.1 Product Launch Feature / Benefit Document (L0026861 L0026881)
- 24. DX 333 Summary of 5.0 and 6.0 Differences IC, PO and RQ (L0017230-0017236)

Additionally, Lawson only alleges that J-CON anticipates claim 6 of the '683 patent. Accordingly, now that ePlus has withdrawn claim 6 of the '683 patent, please confirm that Lawson will withdraw from its exhibit lists all exhibits concerning J-CON.

Sincerely,

Michael Strapp

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